

Gerard Uzzi  
Alexander B. Lees  
MILBANK LLP  
55 Hudson Yards  
New York, New York 10001  
Telephone: (212) 530-5000  
Facsimile: (212) 530-5219

Gregory P. Joseph  
Mara Leventhal  
JOSEPH HAGE AARONSON LLC  
485 Lexington Avenue, 30th Floor  
New York, New York 10017  
Telephone: (212) 407-1200  
Facsimile: (212) 407-1280

*Counsel for the Raymond Sackler Family*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

Chapter 11  
Case No. 19-23649 (RDD)  
Jointly Administered

**RAYMOND SACKLER FAMILY'S MOTION FOR LEAVE TO EXCEED PAGE LIMIT  
IN STATEMENT IN SUPPORT OF CONFIRMATION OF DEBTORS' SIXTH  
AMENDED PLAN OF REORGANIZATION AND IN REPLY TO PLAN OBJECTIONS**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

The Raymond Sackler Family,<sup>2</sup> by and through its undersigned counsel, respectfully represents as follows in support of this motion:

1. The Raymond Sackler Family is filing herewith a statement in support of confirmation of Debtors' Sixth Amended Joint Chapter 11 Plan of Reorganization (ECF No. 3185) (the "**Plan**") and in reply to Plan objections (the "**Statement**").

2. The *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on November 18, 2019 (Dkt. 498) (the "**Case Management Order**") provides that "motions, applications and objections are limited to 40 pages and replies and statements are limited to 20 pages" (Case Management Order Ex. 1, ¶15).

3. The Raymond Sackler Family's Statement addresses the merits of the claims against it to facilitate the Court's consideration of the adequacy of the Shareholder Settlement. The Raymond Sackler Family understands that this Court will not be making findings on the merits of the claims made against the Sackler families. The Statement is submitted to assist the Court in its determination as to whether there are substantial defenses to the allegations sufficient to warrant approval of the Shareholder Settlement.

4. The Statement also addresses collectability issues, otherwise presents support for the Plan, and responds to certain objections.

5. Given the volume of allegations brought forth by the Claimants, the amount in controversy, and the complexity of the issues that need to be addressed, twenty pages is not sufficient for the Raymond Sackler Family to fairly address them. Therefore, the Raymond Sackler Family respectfully submits that relief from the page limits imposed by the Case

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<sup>2</sup> The Raymond Sackler Family consists of Richard Sackler, David Sackler, and the estates of the late Jonathan Sackler and Beverly Sackler.

Management Order is warranted here.

6. The Debtors have informed the Raymond Sackler Family that the Debtors consent to the relief sought herein.

7. For the above reasons, the Raymond Sackler Family respectfully requests that this Court grant the Raymond Sackler Family leave to file its Statement consisting of 114 pages, exclusive of the table of contents and table of authorities, as provided in the proposed order attached hereto as **Exhibit A**.

Dated: August 5, 2021  
New York, New York

/s/ Gerard Uzzi  
Gerard Uzzi  
Alexander B. Lees  
**MILBANK LLP**  
55 Hudson Yards  
New York, NY 10001  
Telephone: (212) 530-5000

/s/ Gregory P. Joseph  
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*Counsel for the Raymond Sackler Family*

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